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Counsel for the United States of America

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

SU CHANG MUN; KELLY BERNIER-
MUN, a/k/a KELLY LYNN MUN; VASILY
LITVINCHUK; NATALIYA LITVINCHUK;
YURIY ROMANYUK; CITY OF
SACRAMENTO; COUNTY OF
SACRAMENTO DEPARTMENT OF
CHILD SUPPORT SERVICES.

Defendants.

Case No. 2:25-cv-01406-DJC-AC

JOINT STIPULATION AND ORDER

Plaintiff United States of America, Defendant Su Chang Mun, and Defendant Kelly Bernier-Mun, have conferred and propose the following schedule for the remainder of this action. To provide some quick background, on October 1, 2025, the United States of America moved for a stay of the above-captioned case due to the lapse of appropriations funding the Department of Justice. (ECF No. 36). The Court granted that request on October 9, 2025. (ECF No. 38).

Pursuant to the Court's Order on October 9, 2025, the parties have conferred about modifying the case schedule or keeping the case schedule set forth on

September 30, 2025. The parties agree that the previous case schedule on September 30, 2025 is appropriate, with two small modifications. The parties propose the following two modifications (indicated in red) to the initial-disclosures deadline and the joint mid-discovery status report deadline:

- Initial Disclosures exchanged by **12/17/2025**;
- All Fact Discovery completed by 3/13/26;
- Designation of Expert Witnesses due 4/10/26 with any rebuttal expert disclosures due 5/8/26 and all expert discovery completed by 6/5/26;
- A joint mid-litigation statement due **1/21/2026**;
- Dispositive Motions filed by 8/14/26 and noticed for hearing 10/8/26 1:30 p.m.;
- Final Pretrial Conference set for 1/14/2027 at 1:30 PM in Courtroom 7 (DJC) before District Judge Daniel J. Calabretta with a joint pretrial statement due 7 days prior in compliance with Local Rule 281 and Judge Calabretta's Standing Order;
- Bench Trial set for 3/15/2027 at 9:00 AM in Courtroom 7 (DJC) before District Judge Daniel J. Calabretta.

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Respectfully submitted,

BRETT A. SHUMATE
Assistant Attorney General

JOSHUA WU
Deputy Assistant Attorney General, Tax Litigation
Branch

Dated: December 8, 2025 /s/ Connor J. Pestovich
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Dated: December 8, 2025 /s/ Timothy Roscoe Carter
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Attorney for Defendant Su Chang Mun

Dated: December 8, 2025 /s/ Kelly Bernier-Mun
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Pro Se Defendant

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: December 9, 2025 /s/ Daniel J. Calabretta
THE HONORABLE DANIEL J. CALABRETTA
UNITED STATES DISTRICT JUDGE